

CUSTOMER NO.: 24498
Attorney Docket No. PF030060
Date of Office Action: 08/18/2008

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Remarks/Arguments

Claims 1, 3 - 9 are pending. Claim 2 has been canceled. Claims 1, 3 - 9 have been amended to more clearly and distinctly claim the subject matter that applicants regard as their invention. No new matter is believed to be added by the present amendment.

Rejection of claims 1-8 under 35 USC §102(b) as being anticipated by Gerhmann (EP 1102430 A1).

Claims 1 - 8 are rejected under 35 USC §102(b) as being anticipated by EP 1102430 A1 issued to Gerhmann (hereinafter "Gerhmann"). Applicants respectfully traverse this rejection for at least the following reasons.

Amended claim 1 recites in part,

"means adapted to store information about devices of the community having trust relationships with said device in the past but now not trusted by said device,"

The Examiner contends that Gerhmann recites previously recited feature "means adapted to store information about devices of the community having trust relationship with said device—" in paragraph [0030]:

"Each of the nodes A - M obtains the public keys of all the other nodes A - M, either they are trusted or untrusted. Each node A - M then creates a list of its trusted nodes and their corresponding keys. E.g., node A which belongs to trust group 202 trust the nodes B, C, D, and E."

Gerhmann *"relates to the problem within ad hoc networks, not having on-line connections to a particular server for getting desired public keys or certificates, required to create trust relations."* (Gerhmann, par. [0009]). In particular, Gerhmann discloses a *"mechanism for checking if different nodes in an ad hoc network share a trust relation and for creating trust among a certain set of nodes without any pre-defined relations (emphasis added)"* (Gerhmann, par. [0007]).

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In fact, paragraph [0030] explicitly states that there is not any pre-defined relation between the nodes. This is due in part to the nature of the ad hoc network in Gerhmann. *"Ad hoc networks are **created on the fly** between entities that happen to be at the same physical location (emphasis added)"* (Gerhmann, paragraph [0007]).

Paragraph [0030] of Gerhmann indicates that each node A-M of an ad hoc network 201 is able to obtain the public keys of all the other nodes (trusted or not trusted) of the network 201 and creates a list of trusted nodes. Paragraph [0035] of Gerhmann indicates that a server node A stores lists of "server-trusted nodes" and "server-untrusted nodes" but the untrusted nodes are nodes that were not trusted before by the server node A. These nodes are in fact unknown to server node A. Gerhmann further discloses in paragraphs [0036] to [0040] how to distribute the trust relations within the ad hoc network such that, at the end of the process, the untrust list of server node A is empty. The nodes do not keep track of nodes that were previously trusted but which are no longer trusted.

By contrast, amended claim 1 clearly states otherwise – *"means adapted to store information about devices of the community **having trust relationships with said device in the past but now not trusted by said device** (emphasis added)."*

Accordingly, amended claim 1 is not anticipated by Gerhmann. Dependent claims 3 – 9 recite the features of amended claim 1 and are not anticipated by Gerhmann for at least the aforementioned reasons.

Rejection of claim 9 under 35 USC §103(a) as being unpatentable over Gerhmann (EP 1102430 A1) in view of Fraser (U.S. Patent Publication. No. US2003/0131232 A1).

Claim 9 is rejected as being unpatentable by Gerhmann in view of US Patent Publication No. US2003/0131232 A1 (hereinafter, "Fraser"). Applicants respectfully traverse this rejection for at least the following reasons.

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The Examiner contends that *"Frasier, in an analogous art, discloses that a registration agent of a community may remove a member from the community (Frasier: paragraph 0066)." Applicant respectfully disagrees that Frasier discloses such a feature.*

Frasier pertains to a community of trusted members, such as a medical institution, that maintains a networked community of employees associated with the medical institution (paragraph [0006]). The medical institution may belong to a higher-level network community with other medical institutions (paragraph [0006]). A directory is used to store the members of the community as well as other data associated with the member. Trust associated with an identity of a network user is managed through the membership of the user in the directory (paragraph [0007]).

Paragraph [0066] of Frasier recites, in part, the following:

"Based on the provided search criteria, the directory management module presents interface 150 to include a list 160 of matching members. The registration agent may select one or more of the members to update his or her identity information, or remove the member from the community."

Amended claim 9 recites the following:

"The device according to claim 6, wherein said first device is furthermore able to banish another device of said community if the identity of said device to be banished is contained in the first or the second object of said first device, said banish operation comprising removing the identity of said device to be banished from said first or second object and inserting said identity in said third object of said first device."

Amended claim 6 recites, in part, the following:

a first object capable of containing identities of devices trusted by said device and trusting said device;

a second object capable of containing identities of devices trusted by said device; and

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a third object capable of containing identities of devices distrusted by said device.

In other words, the first device can banish a banished device if the banished device's identity is contained in the first device's first or second object (i.e., the first device trusts the banished device and the banished device trusts the first device OR the first device trusts the banished device). The banishing operation removes the banished device from the first or second object and inserts the banished device's identity in the first device's third object (i.e., distrusted by the first device).

The deletion of Frasier differs from the banishment of amended claim 9. In Frasier, the deletion of a member from the community is merely the deletion of the member from the directory. A user interface is used to facilitate this deletion (see Frasier, Fig. 10).

By contrast, the banishment of a device in claim 9 differs from Frasier. In particular, the banished device's identity is retained and placed in a distrusted list associated with the first device. In addition, the banishment is performed only upon the conditions set forth in claim 9.

One skilled in the art would not combine Gerhmann with Frasier to produce the banishment recited in amended claim 9. One skilled in the art would realize that deletion of a record in a directory is not the same as banishment. Banishment does not result in the identity of the banished device being deleted. Instead, the result of banishment is the placement of the identity of the banished device in the first device's third object. Frasier does not recite, teach, or suggest banishment as recited in claim 9. Accordingly, even if the teachings of Gerhmann and Frasier were combined as suggested by the Examiner, the combined arrangement fails to disclose or suggest each and every limitation recited in claim 9. Furthermore, the office action has failed to clearly articulate a reason of motivation to combine these references since they do not produce the feature

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recited in claim 9 and as such, claim 9 is patentably distinguishable over any combination of Gerhmann and Fraser.

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited.

It is believed that there are no additional fees due with regard to the filing of this response. However if there is an additional fee due, please charge the fee, or credit any overpayment, to Deposit Account No. 07-0832.

Respectfully submitted,
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